

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

Honorable Thomas Vanaskie
(Ret.), Special Discovery
Master

**THE ZHP PARTIES' MOTION TO REDACT AND SEAL
PORTIONS OF THE HEARING TRANSCRIPT OF SEPTEMBER 10, 2021
PURSUANT TO LOCAL CIVIL RULE 5.3(g)**

Defendants Zhejiang Huahai Pharmaceutical Co., Ltd. ("ZHP"), Princeton Pharmaceutical Inc. ("Princeton"), Huahai U.S. Inc. ("Huahai U.S.") and Solco Healthcare U.S., LLC ("Solco", and collectively with ZHP, Huahai U.S., and Princeton, "the ZHP Parties"), by and through their counsel, respectfully move, pursuant to Local Civil Rule 5.3(g), to redact and seal portions of the transcript of the hearing before Special Discovery Master Judge Vanaskie dated September 10, 2021 (the "Sept. 10 Transcript") on Plaintiffs' Motion to Compel (Dkt. No. [1405](#)).

In support of this motion, the ZHP Parties rely upon the Declaration of Kelly Bonner, Esq., dated September 27, 2021 (the "Bonner Declaration"), and the Declaration of Dr. Min Li dated September 27, 2021 (the "Dr. Li Declaration"). A

proposed form of Order, including Proposed Findings of Fact and Conclusions of Law pursuant to Local Civil Rule 5.3(c)(6), is also submitted herewith.

Pursuant to Local Civil Rule 7.1(d)(4), no legal brief is required because the relevant proposed findings of fact and conclusions of law required by Local Civil Rule 5.3(c)(2) are contained in the Proposed Order and supported by the Bonner Declaration and the Dr. Li Declaration, which describe with particularity: (a) the nature of the portions of the Sept. 10 Transcript to be redacted and sealed; (b) the legitimate private interest which warrants redacting and sealing the Sept. 10 Transcript; (c) the clearly defined and serious injury that would result if the Sept. 10 Transcript were not redacted and sealed as proposed; (d) why less restrictive alternatives to redacting and sealing portions of the Sept. 10 Transcript are not available; (e) any prior Order sealing the Sept. 10 Transcript; (f) the identity of any party or nonparty known to be objecting to the sealing request; (g) the materials to which there is an objection; (h) the basis for the objection; and (i) whether the material or information sought to be redacted was previously sealed by the Court in the pending action, and (j) why the materials should be maintained under seal.

Dated: September 27, 2021

Respectfully submitted,

/s/ Seth A. Goldberg
Seth A. Goldberg, Esq.
Lead Counsel and Liaison
Counsel for Defendants

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